

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

ALTRIA'S PROPOSED VERDICT FORM

This Document Relates to:

*San Francisco Unified School District v.
JUUL Labs, Inc., et al.*

[PROPOSED] JURY VERDICT FORM

PUBLIC NUISANCE

1. Do you find that SFUSD proved that Altria is liable for a public nuisance that currently exists on SFUSD school grounds?

Yes ____ No ____

*** STOP ***

If you answered "Yes" to Question 1, answer Question 2.

If you answered "No" to Question 1, skip Questions 2 and 3 and proceed to Question 4.

2. Identify the school or schools within the SFUSD district where SFUSD proved that a public nuisance currently exists for which Altria is liable:

_____.

3. For each school identified in Question 2, describe the condition(s) at that school that SFUSD proved is currently a public nuisance for which Altria is liable:

_____.

NEGLIGENCE

4. Do you find that SFUSD proved that Altria is liable for Negligence?

Yes ____ No ____

RICO

5. Do you find that SFUSD proved that Altria is liable for violating section 1962(c) of the RICO statute?

Yes ____ No ____

6. Do you find that SFUSD proved that Altria is liable for violating section 1962(d) of the RICO statute?

Yes ____ No ____

*** STOP ***

If you answered "Yes" to any of Questions 4, 5, or 6, proceed to Question 7.

If you answered "No" to Questions 4, 5, and 6, you are done. Skip the remaining questions and sign and return the Verdict Form.

COMPENSATORY DAMAGES

Decide the total amount of damages sustained by SFUSD as a result of any negligence or RICO violations you found.

7. In what amount, if any, is SFUSD entitled to compensatory damages?

\$ _____

*** STOP ***

If you answered any amount other than "\$0.00," proceed to the Question 8.

If you answered \$0.00, you are done. Skip the remaining Questions and sign and return the Verdict Form.

8. Identify the category or categories of injury (such as [examples to be given based on evidence at trial]) you relied on when calculating the amount of compensatory damages in Question 10 and the amount of compensatory damages associated with each category.

_____	\$ _____
_____	\$ _____
_____	\$ _____
_____	\$ _____

*** STOP ***

If you answered "Yes" to Question 5, answer Question 9.

If you answered "No" to Question 5, skip Question 9 and proceed to the Instructions below.

9. Of the amount you found in Question 7, how much, if any, was due to a violation of section 1962(c) of the RICO statute for which Altria is liable?

\$ _____

***** STOP *****

If you answered "Yes" to Question 6, answer Question 10.

If you answered "No" to Question 6, skip Question 10 and proceed to Question 11.

- 10. Of the amount you found in Question 7, how much, if any, was due to a violation of section 1962(d) of the RICO statute for which Altria is liable?**

\$ _____

MITIGATION OF DAMAGES

- 11. Could SFUSD have avoided some or all of its harm with reasonable efforts or expenditures?**

Yes ____ No ____

***** STOP *****

If you answered "Yes" to Question 11, answer Question 12.

If you answered "No" to Question 11, skip Question 12 and proceed to the Instructions below.

- 12. By what amount would SFUSD's damages have been reduced if it had taken reasonable efforts or expenditures?**

\$ _____

***** STOP *****

If you answered "Yes" to Question 4, answer Question 13.

If you answered "No" to Question 4, you are done. Skip Question 13 and sign and return the Verdict Form.

PUNITIVE DAMAGES

- 13. Do you find by clear and convincing evidence that punitive damages are warranted against Altria:**

Yes ____ No ____

*** STOP ***

If you answered "Yes" to Question 13, answer Question 14.

If you answered "No" to Question 13, you are done. Skip Question 14 and sign and return the Verdict Form.

14. What is the total amount of punitive damages, if any, that you find should be assessed against Altria?

\$ _____

Jury Foreperson